

1 Isaac D. Zorea
2 Law Office of Isaac Derek Zorea
3 P.O. Box 210434
4 Anchorage, AK 99521
(907) 677-3779
(907) 644-2802 facsimile

5
6 IN THE UNITED STATES DISTRICT COURT
FOR THE DISTRICT OF ALASKA

7 CAROLYN MITCHELL,
8 Plaintiff,
9 vs.

10 ANCHORAGE POLICE DEPARTMENT and the
11 MUNICIPALITY OF ANCHORAGE, a
12 municipal corporation, WALTER MONEGAN,
Officer HENIKMAN, and Officer J. VOSS,
Defendants.

)
)
)
) DECLARATION OF ISAAC
) ZOREA IN SUPPORT OF
) PLAINTIFF'S MOTION
) FOR PARTIAL SUMMARY
) JUDGMENT
)
) Case No. 3:05-cv-00273-JWS

14 I, Isaac Derek Zorea, declare as follows:

15
16 1. I am competent to testify to the matters set forth and do so based on my
17 personal knowledge.

18 2. I am one of the attorneys representing the above-named Plaintiff in this
19 matter.

20 3. Attached hereto as **EXHIBIT A** is a true and correct copy of selected
21 portions of Monegan's Responses to Plaintiff's Requests for Admissions.

22 4. Attached hereto as **EXHIBIT B** is a true and correct copy of selected
23 portions of Officer Justin Voss's Responses to Plaintiff's Interrogatories and
24 Requests for Production.
25
26

1 5. Attached hereto as **EXHIBIT C** is a true and correct copy of selected
2 portions of Officer Ross Henikman's Responses to Plaintiff's Interrogatories and
3 Requests for Production.
4

5 6. Attached hereto as **EXHIBIT D** is a true and correct copy of the Affidavit
6 of Carolyn Mitchell.

7 7. Attached hereto as **EXHIBIT E** is a true and correct copy of Officer Ross
8 Henikman's Responses to Plaintiff's Requests for Admissions.

9 8. Attached hereto as **EXHIBIT F** is a true and correct copy of Officer Justin
10 Voss's Responses to Plaintiff's Requests for Admissions.

11 9. Attached hereto as **EXHIBIT G** is a true and correct copy of the transcript
12 of Videotape Deposition of Officer Ross Henikman.
13

14 10. Attached hereto as **EXHIBIT H** is a true and correct copy of the transcript
15 of Videotape Deposition of Officer Justin C Voss.
16

17 11. Attached hereto as **EXHIBIT I** is a true and correct copy of Monegan's
18 Responses to Plaintiff's Interrogatories and Requests for Production.

19 I declare under penalty of perjury under the laws of the United States that the
20 foregoing is true and correct.
21

22 Dated this 30th day of April, 2007.

23 S/ Isaac Zorea
24 Law Offices of Isaac D Zorea
25 P.O. Box 210434
26 Anchorage, AK 99521
27 907-830-1385
28 907-677-3779
 Eyedz@gci.net